

## **Exhibit 31**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN N-  
NITROSODIMETHYLAMINE (NDMA)  
CONTAMINATION PRODUCTS  
LIABILITY LITIGATION

HON. ROBERT B. KLUGER

Civil No. 19-2875 (RBK/JS)

**DECLARATION OF JONATHAN JAFFE**

I, Jonathan Jaffe, declare, under penalty of perjury, pursuant to 28 U.S.C. § 1746,  
as follows:

I, Jonathan Jaffe, am the founder and owner of Its-Your-Internet, a technology and ESI  
discovery consulting firm, established in 2008.

For the past fifteen years, I have provided ESI discovery and litigation consulting for  
attorneys in complex litigation throughout the lifecycle of each litigation (from inception to  
the ultimate resolution). In multiple multi-district litigations inclusive of this one, I have  
assisted with initial discovery efforts to get the parties to agree to search terms as well as to  
discover the structure of Defendants' systems for maintaining ESI and physical materials. I  
also assisted Plaintiffs' counsel in the In Re Benicar (Olmesartan) Products Liability  
Litigation that was previously litigated before this Court.

Between 2003 and 2008, I worked in-house for Weitz & Luxenberg, P.C. overseeing  
software development, the submission of hundreds of thousands of claims in mass tort  
litigation (MDL), and testifying as an expert witness in federal cases.

1  
2 I graduated magna cum laude from Columbia University with a BA in Economics-  
3 Mathematics in 1999.

4  
5 A copy of my *curriculum vitae* is attached hereto as **Exhibit A**.

6  
7 **CASE SPECIFIC BACKGROUND**

8  
9 I was retained by the Plaintiffs' Executive Committee in this case on October 14, 2019.

10  
11 I read and executed the Protective Order in this case before starting any work on it.

12  
13 On November 14<sup>th</sup>, I received access to a repository of documents that Defendants had  
14 produced to date in this litigation.

15  
16 On November 15<sup>th</sup>, I met with and collected information from counsel for Defendants Mylan,  
17 ZHP, Teva/Actavis and Torrent regarding their internal systems and retention policies.

18  
19 On November 19<sup>th</sup> and November 22<sup>nd</sup>, I spoke with and collected information from counsel  
20 for Defendant Aurobindo regarding their internal systems and retention policies.

21  
22 On November 25<sup>th</sup> and December 2<sup>nd</sup>, I participated in two calls with Defendants specifically  
23 on the proposed sets of search terms.

24  
25 I have also been privy to the communications via letter and e-mail between the parties  
26 regarding ESI discovery.<sup>1</sup>

27  
28 **BASIS OF MY OPINIONS**

29  

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<sup>1</sup> This included responses from Defendant Hetero on November 27<sup>th</sup>. It also included communications, *e.g.* Plaintiffs' April ESI letter, that predated my retention to which I received access after I signed the Protective Order.

1 While I have been retained by the Plaintiffs, the opinions I express below are independent of  
2 any party.

3  
4 Sound discovery and understanding of Defendants' systems and tailored search terms are in  
5 the equal interest of both parties.

6  
7 I have unfortunately born witness to too many instances where considerable time was  
8 misspent by both parties over technical misunderstandings. That included considerable  
9 efforts to produce massive amounts of data that was in an unusable form, wasted time  
10 investigating and pursuing documents that did not exist, and scrambles to reproduce and  
11 correct deficient productions because instead of confirming facts, non-technical individuals  
12 proffered speculative answers not only to the other party, but also to the Court.

13  
14 While this is an imperfect process, much time, effort, and, ultimately, expense can be saved  
15 through cooperative efforts by both parties to establish baseline facts and metrics.

16  
17  
18 **OPINIONS**

- 19  
20 1. It is an unreasonable expectation that documents going to the heart of the issues in this  
21 litigation will not be missed by Defendants' proposal to modify nearly all search terms by  
22 commercial drug names and/or solvents.

23  
24 Just a cursory search of documents already produced bring up raw material specifications  
25 (ex: MYLAN-MDL2875-00024109) and regulatory communications (ex: TORRENT-  
26 MDL2875-00004140, TEVA-MDL2875-00005672) that were deemed relevant to be  
27 produced which do not have the commercial drug names.

28  
29 If Defendants' proposals to modify almost all search terms by their commercial drug  
30 names and/or solvents are adopted, documents such as these will not be captured.

1 2. It has been my observation in other litigations that during the development of new  
2 products, these products are referred to by a project name or a code name. I have yet to  
3 see a product that carried the name under development unchanged to the commercial  
4 product name.

5  
6 Thus, in other litigations, Defendants made a good faith effort to provide suggested lists  
7 of additional terms to Plaintiffs that were common internal references whether those were  
8 the project names under R&D, code names, unique identifiers, or even unexpected  
9 abbreviations.

10  
11 The additional terms suggested by Defendants in other litigations were not obvious or  
12 knowable. In speaking with Defendants in other litigations, they told me they not only  
13 examined documents to develop suggested terms, but additionally interviewed potential  
14 custodians to come up with these lists.

15  
16 In this litigation, Defendants have not produced any such suggestions.

17  
18 3. In all of the MDL litigations in which I have participated, Defendants collected  
19 documents from custodians known to have material relevant to the issues in the litigation  
20 prior to and/or during the negotiation of search terms.

21  
22 In other litigations, these collected sets would be used to sample and test search terms.

23  
24 In those other litigations, reasonable expectations upon testing were sometimes shown to  
25 be false.

26  
27 For example, some terms that both parties thought were narrow turned out to result in  
28 unanticipated documents and had to be further modified. Other terms that Defendants  
29 thought were overly broad turned out to be surprisingly well tailored when tested against  
30 specific custodians.

1 In this litigation, Defendants stated on the calls that I have been on that they have not  
2 attempted to collect custodial documents, even from custodians originally proposed by  
3 Defendants, nor have they run any set of non-custodial documents against the proposed  
4 search terms to get counts and to test that these terms will result in relevant documents  
5 and not miss large swaths of known relevant documents.  
6

- 7 4. While I have been appreciative of the efforts of the Defendants' counsel to help me help  
8 the Plaintiffs' counsel understand the Defendants' various systems in use, the lawyers  
9 have not been the persons most knowledgeable on the corporate systems, policies and  
10 procedures.  
11

12 The information that I have been gathering from the meet and confers has been  
13 inconsistent, contradictory, speculative and incomplete.  
14

15 Some counsel had familiarity with the systems to which they had personal access, but for  
16 those systems, their answers were limited by their personal experience. Since Defense  
17 counsel will certainly not be custodians in this litigation, those answers are misleading.  
18

19 For other systems, counsel clearly had no direct knowledge, had never seen, used, or was  
20 even aware systems might exist.  
21

22 I am not ascribing this to any bad faith on the part of the individuals who sat across from  
23 me. But, just as I am not a lawyer or a judge, I have concerns about the integrity of the  
24 answers given by non-technical individuals, many of whom confessed to not being  
25 technical.  
26

27 Since Plaintiff requests for production, interrogatories, admissions, and elicited testimony  
28 will undoubtedly be predicated on many of these answers, accuracy is critical.  
29

30 In other litigations where I have done similar meet and confers, certainly there were  
31 Defense attorneys answering the technical questions I asked. There were two key

1 differences.

2  
3 First, the attorneys who did assume the role of person most knowledgeable were highly  
4 technical and well familiar with the systems. Often, they were playing a pivotal ongoing  
5 role in the collections from those systems and had intimate knowledge.

6  
7 Secondly, there was nearly always a technical non-lawyer present in the room.

8  
9 Not only did that facilitate getting accurate answers where the answer to the question was  
10 known, but it also meant that where Defense counsel needed to follow up, there was a  
11 technical individual who helped ensure the question was not lost in translation.  
12  
13

1  
2 **AFFIRMATION**  
3


4 Thank you to the Court for hearing my opinions.  
5

6 Pursuant to 28 U.S.C. § 1746, I further declare under penalty of perjury of the laws  
7 of the United States of America that the foregoing is true and correct.  
8

9 Executed on this 5<sup>th</sup> day of December, 2019, at Forest Hills, NY.  
10

11  
12  
13  
14  
15  
16

Digitally signed by  
Jonathan Jaffe  
DN: cn=Jonathan Jaffe,  
o=www.its-your-  
internet.com, ou,  
email=jjaffe@its-your-  
internet.com, c=US  
Date: 2019.12.05 15:16:52  
-05'00'



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Jonathan Jaffe



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## **EXPERT TECHNOLOGY + LITIGATION ESI CONSULTING**

**ESI Technical Representative...Federal Expert Witness...ESI Discovery Consulting  
Database/Data Analysis...Statistical Sampling...Gap Analysis...ESI Forensics**

### **Its-Your-Internet**

**2008-present**

Its-Your-Internet is a bespoke general software and ESI litigation support consultancy. It was established in March 2008.

### ***Founding Owner, 2008-present;***

- Plaintiffs' Designated ESI Representative for Over 500 Firms on Multiple Mass Tort Litigations involving Product Liability with Medical Devices and Drugs (hundreds of thousands of individual plaintiffs collectively) extensive engagement from early discovery through trial
- Plaintiffs' Designated ESI Representative in Multiple Class Action Suits (many involving Fair Credit Reporting Act violations in consumer reporting)
- Plaintiffs' Designated ESI Representative in Attorney General Suits involving Product Liability
- Expert Witness in Federal Cases on ESI Issues
- Database Analysis (Consumer Reports, Adverse Event/Safety, Clinical Trial, Registry, Call Note, Sales and Marketing, Statistical Analysis)
- Assisting with Class List development and certification
- Working with Extremely Large Document Productions (100MM+ pages)
- Working with Extremely Large Database Productions and Extracts
- Analysis of Statistical Results from Clinical Studies
- Trial Support (exhibit list document selection and preparation, helping find documents used with adverse witnesses and in cross examination, translating finds into usable exhibits, demonstratives, jury charges)
- Plaintiff Document Production (Workflow, Redaction, Privilege Review, Staging and Producing)
- Built Bespoke Production Review Software
- Discovery Format and Production Negotiation
- Redaction / Privilege Review Management
- Keyword Search Term Recommendations, Predicative Coding Recommendations
- Custodial Production Forensics
- Custodial Production Storage Recommendations
- Drafting ESI Related Interrogatories, Requests for Production, Requests for Admission
- Deduplication, Gap Analysis, Statistical Sampling, Forensic Analysis, Discovery Issues Analysis
- Assisting Attorneys on 30(b)(6) Depositions, Meet and Confers, Hearings, Motions, Draft Orders, Stipulations, Rule 34 issues
- Supporting other Expert Witnesses
- Creating Supporting ESI Reports for Court Hearings
- Deposition Workup and Providing Deposition Assistance

- Supervising and participating (design, coding, analysis) over a large variety of projects, most with significant teams, inclusive of:
  - Litigation Support Custom Applications / Software / Data Analysis
  - Subscription Site for M&A Information, OAuth2 Authentication, Graph Analysis, and Internal Application Development for Investment Bank
  - Real-time Chat Extension for Large VoIP Provider
  - Redesign of Class Action Support System for a Top 3 Legal Administrative Services Firm (Billions of Dollars of Administration)
  - LMS and Exam SaaS applications for West African Market
  - Mobile West Africa #1 App – FindAMed
  - Subscription Based Site for Theater and Performing Arts Companies
  - School Based Management Systems Development
  - Raffle Contest Site and Variations
  - Writing and Support for Core Remake of Multi-Million Page Web Site
  - SEO and SEM Management for Multiple Clients
  - Finalist in Multi-Billion \$ RFP for NYC DOE
  - > 50 original web sites inclusive of e-Commerce
  - Countless consultations with Entrepreneurs
- Multiple Entrepreneurial Projects Using Bleeding Edge Technology
- Established a Dozen Key Reciprocal Partnerships
- > 30 Talks and Lectures on Technology and Social Media for Chambers of Commerce, SBA, Charities and Non-Profit, Business Groups and Organizations
- Day to Day Resource Management, Staffing, Administration
- Oversight of Remote and Offshore Resources
- Branding, Marketing, Materials (for Firm and Clients)

General Technologies: NoSQL, SQL, C#, PHP, NodeJS, Python, Django, NPM, PaaS, Heroku, HTML5, BackboneJS, EmberJS, AngularJS, MongoDB, Cloudant, Redis, MSSQL, Oracle, MySQL, MariaDB, Postgres SQL, ExpressJS, Git/GitHub, GruntJS, E2E Testing, ASP.NET MVC, ASP.NET, Cordova PhoneGap, Amazon Web Services (S3, CloudFront, EC2), Azure, XML, XML Schema, LESS, CSS3, SocketJS, Bower, Joomla, Drupal, WordPress, Office365, SharePoint, Salesforce, JIRA, Photoshop, Illustrator, GIMP, RESTful and Agile Methodologies, Quantum Computing (early exploration).

Legal Review Platforms: Relativity, Catalyst Insight, Everlaw, iConect-Xera, Eclipse, Disco, Crivella

Forensic Software: FTK Imager, Encase, Cellebrite PA UFED, Transend Migrator, Magnet IEF

### **Weitz & Luxenberg, P.C.**

**2002-2008**

Weitz & Luxenberg is one of the nation's original and foremost firms in mass tort asbestos litigation handling nearly one million simultaneous pending court actions, 250,000 bankruptcy claims, and over 50 other personal injury litigations.

***Manager of Software Development, 2003-2008***

***Sr. Project Manager, 2002-2003***

- Federal Expert Witness resulting in substantial eDiscovery Sanctions
- Collection of documents for litigation; Validation; Forensic Analysis
- Coordinated activities of 5 teams, comprising 20 resources
- Achievements included: establishing and overseeing the 4<sup>th</sup> largest personal injury law firm site, [www.weitzlux.com](http://www.weitzlux.com), all internal development, sales/marketing efforts, public relations, and client services.
- Chief software architect.
- Increased site traffic 5,000% (to 12,000+ unique visitors/day) and original content by 2MM+ pages.
- Positioned web site as a new sales channel, netting \$MM in new revenue, 45,000% increase in leads to 1,500 new case leads/week.
- Gained first page ranking for 750,000+ search terms used to find the site including some of the most competitive (ex. *asbestos lawyer*).
- Reduced annual Internet marketing costs by \$3.6 million, or 96%, while increasing returns.
- Transformed internal development into a premier asset of the firm resulting in joint development efforts with Federal Express, 2 case studies on our use of Web Services by Microsoft, and the adoption of our proprietary document management technologies by other law firms across the country.
- Oversaw distribution of \$300 million/year in settlements to tens of thousands of clients.
- Increased overall internal system performance 500% with a 75% reduction in system downtime.
- Mentored technical team, developers, analysts, SEO (search engine optimization)

Technologies: C#. VB.NET, ASP.NET, SQL2005, SQL2000, OLTP, OLAP, JavaScript, HTML, Exchange2003, Win2003, IPsec, CISCO VPN, Citrix Presentation Server, Win2000, WinNT4, Project, PowerPoint, WebSense, eSafe, Active Directory (LDAP) Interface, XML, xHTML, Web Services, Visual Studio Team Foundation Server, VSS, VB6, Access, Microsoft Office, Cisco PIX (Firewall), Tape Library Backup, Document Management, CRM, ERP, Great Plains 7.0, Great Plains 6.0, Goldmine, ASP3.0, IIS 6.0, Windows Services, Snap NAS, LeadTools (Imaging), SharePoint, AscentCapture, Concordance, Summation, iConnect, ComponentOne for .NET, Flash, Mac OSX, Photoshop, SEO

Case Studies (Business + Technology):

[http://download.microsoft.com/documents/customerevidence/27250\\_Weitz\\_Lux\\_Final\\_BA.doc](http://download.microsoft.com/documents/customerevidence/27250_Weitz_Lux_Final_BA.doc)

[http://download.microsoft.com/documents/customerevidence/27249\\_Weitz\\_Lux\\_Final\\_CS.doc](http://download.microsoft.com/documents/customerevidence/27249_Weitz_Lux_Final_CS.doc)

**IMJ Group Inc.**

**2001-2002**

IMJ was a startup business/technology consulting think tank and solution implementation firm I started with two partners.

***Vice President, Technology / Founding Partner***

- Established corporate status for the firm and branding.
- Recruited and supervised staff.

Technologies: Linux, BSD, Java, Access, Microsoft Project, Microsoft PowerPoint, Microsoft Excel.



**Winstar Communications, Inc., Web Development Group** **2000-2001**

The Winstar Web Development Group was an Internet consultancy, part of Winstar (a dot-com telecommunications firm), specializing in large Intranets and Internet sites.

*Acting Director of Technology, 2001;*  
*Senior Technology Architect, 2000-2001*

*Technical Leadership*

- Directed a team of 17 – project managers, developers, system engineers, and site designers.
- Managed full project lifecycle for six and seven digit budgets.
- Chief Software Architect.
- Designed Internet and Intranet sites, including Hosting Solutions.
- Established procedures and process, integrating what had been five company acquisitions into one team.
- Mentored development team.

*Business Development*

- Increased average project value 10,000% (from \$50,000) to \$5 million, including winning the team's first \$1 million contract.
- Liaised successfully with other Winstar divisions (Hosting, Office.com, Professional Services, and Winstar for Buildings) resulting in improved sales and project coordination.
- Led Winstar team on a \$50 million proposal for the NYC Board of Education with partners Sun, Oracle, Lucent, Microsoft and Compaq.

Technologies: ASP 3.0, SQL2000, SQL 7.0, JavaScript, HTML, Project, PowerPoint, VSS, Exchange2000, Win2000, WinNT4, WebSense, Active Directory, VB6, VB5, Visio, Microsoft Office, Flash, Photoshop, QuarkXpress.

Example web site: <http://www.nationalmssociety.org> still largely uses the same information architecture laid out over 18 years ago.

**Valinor, Inc.** **1995-2000**

Valinor Inc., a wholly owned subsidiary of IKON Office Solutions, was the original Microsoft Solutions Partner/Provider & Authorized Technical Education Center in New York City, consulting for Fortune 500 firms.

*Technical Project Manager / Microsoft Certified Trainer, 1998-2000*  
(after graduating Columbia);

*Technical Project Leader / Senior Technical Architect, 1996-1998*  
(while attending Columbia full time 20+ hrs/wk);

*Senior Application Developer / Application Developer, 1995-1996*  
(while attending Columbia full time, 20+ hrs/wk)

### *General Achievements*

- Increased average project value, formerly \$100,000 average, 500% to \$500,000
- Led teams of up to 10 developers

### *Valinor Key Consulting Projects*

- **AIG/AIU NAD** — migration of AIG Europe's mainframe-based quotation and policy generation system to Microsoft Windows/Office workstation platforms, reducing the time to policy from days to minutes.
- **Berkery, Noyes & Co.** — a company-wide line of business application matching companies seeking to sell themselves with potential buyers.
- **The College Board** — Internet application to gather annual survey data for all United States accredited colleges and universities.
- **DLJ** — on site training.
- **Garban Intercapital** — a cash derivatives trading system utilized by 60 brokers.
- **IKON Office Solutions** — reconciled revenue reporting data from multiple disparate databases.
- **Matsushita** — workflow support ticketing system.
- **Maersk Shipping** — reconciled multiple shipping databases.
- **Merrill Lynch** — on site training on active trading floors.
- **NYC Department of Technology** — on site training.
- **Sumitomo Mitsui** — application to monitor, track and handle all transactions and interest calculations for a multi-billion per year transfer of high risk loans.
- **Sun Chemical** — on site training and follow up consulting.
- **Yankee Copyrights Management** — a large eCommerce application for a startup to create a marketplace for permissions to use and replicate copyrighted materials.

Technologies: ASP2.0, SQL7.0, SQL6.0, Sybase, Oracle, MTS, COM, JavaScript, HTML, Project, Powerpoint, VSS, Exchange5, WinNT4, WinNT3.51, Unix-Solaris, C++, MFC, VB6, VB5, VB4, VB3, Access, Visio, Goldmine, Microsoft Word, Excel

## ADJUNCT PROFESSOR

Columbia University School of Continuing Education, evening classes 2003-2005

- Taught Database Design/Advanced SQL, and .NET Programming courses — QC7304, QC7305, QC7403.
- Developed curriculum for courses, part of SASE track certificate program.

## EDUCATION

Bachelor of Arts, Economics/Mathematics, Magna cum Laude 3.72 GPA, Columbia University, 1999

Stuyvesant High School, 1995

**CERTIFICATIONS**

Microsoft Certified Professional, 1998

Microsoft Certified Trainer, 1998

**MAJOR LAW FIRMS**

LANIER LAW FIRM

SIMMONS HANLY CONROY

BARON BUDD

SEEGER WEISS

WEITZ & LUXENBERG

BERGER MONTAGUE

MAZIE SLATER KATZ & FREEMAN

BAILEY PEAVY BAILEY

KAISER GORNICK

SANDERS VIENER GROSSMAN

SALIM BEASLEY

CRONIN FRIED

NEBLETT, BEARD & ARSENAULT

BLASINGAME BURCH GARRARD ASHLEY

NICHOLS KASTER

PODHURST ORSECK

KIRTLAND & PACKARD

AYLSTOCK, WITKIN, KREIS & OVERHOLTZ

BEASLEY ALLEN

KAZAN, MCCLAIN, SATTERLEY & GREENWOOD

NAPOLI SHKOLNIK

**EXPERT TESTIMONY**

*Hearings*

**2015**

IN RE BENICAR (OLMESARTAN) PRODUCTS LIABILITY LITIGATION.  
UNITED STATES DISTRICT COURT NEW JERSEY, CAMDEN VICINAGE  
No. 1:15-md-02606

**2010**

IN RE: GADOLINIUM BASED CONTRAST AGENTS LITIGATION.  
UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO, EASTERN DIVISION  
No. 1:08-GD-50000, MDL NO. 1909

**2007**

In re SEROQUEL PRODUCTS LIABILITY LITIGATION.  
UNITED STATES DISTRICT COURT MIDDLE DISTRICT FLORIDA, ORLANDO DIVISION  
No. 6:06-md-1769-Orl-22DAB.

*Depositions*

**2019**

RALPH GAMBLES, THOMAS MERCK, AND ELISE COMPO v. STERLING INFO SYSTEMS  
UNITED STATES DISTRICT COURT NEW YORK, SOUTHERN DISTRICT  
1:15-cv-09746-PAE

**2019**

SCOTT RILEY, MICHELLE KUNZA, VENUS COLQUITT-MONTGOMERY, JONATHON ALDRICH,  
AND KENDRA BUETTNER v. MONEYMUTUAL, LLC, SELLING SOURCE, LLC, AND  
PARTNERWEEKLY, LLC  
UNITED STATES DISTRICT COURT MINNESOTA  
No. 16-cv-4001 (DWF/LIB)

**2015**

PLAINTIFFS V. SMITHKLINE BEECHAM CORPORATION D/B/A,  
GLAXOSMITHKLINE  
PHILADELPHIA COUNTY COURT OF COMMON PLEAS  
Nos. 01144, 0402, 3694, 3678, 3672, 3758, 3686, 3727, 0489

**2015**

JOSEPH JAUHOLA VS. CANADIAN NATIONAL RAILWAY COMPANY,  
AND WISCONSIN CENTRAL, LTD.  
UNITED STATES DISTRICT COURT MINNESOTA  
No. 14-cv-1433

**2007**

In re SEROQUEL PRODUCTS LIABILITY LITIGATION.  
UNITED STATES DISTRICT COURT MIDDLE DISTRICT FLORIDA, ORLANDO DIVISION  
No. 6:06-md-1769-Orl-22DAB.



## SPEAKING ENGAGEMENTS

### *Chambers of Commerce*

- Greater NY Chamber of Commerce
- Forest Hills Chamber of Commerce
- Franklin Square Chamber of Commerce
- Medford Chamber of Commerce
- Rockville Centre Chamber of Commerce
- Oceanside Chamber of Commerce
- BRiSC - the Unofficial Silicon Alley Chamber of Commerce

### *Small Business Administration*

- USSBA (March 2010)
- USSBA (April 2010)
- USSBA (May 2010)

### *Business Groups and Organizations*

- Independent Business Women's Group
- Associated Builders & Contractors – Lower NY State
- Associated Builders & Contractors – Nassau/Suffolk
- East End Women's Network

### *Charities and Non-Profits*

- Northport Rotary
- Kiwanis International

### *Continuing Education*

- Columbia University – School of Continuing Education – adjunct professor
- Locust Valley Adult Education
- College of New Rochelle – Graduate Program
- Monroe College – Graduate Program